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May 27, 2025

VIA ECF

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East, Room S905
Brooklyn, New York 11201

Re: Zapantis-Dalamakis v. City of New York, et al.
24 Civ. 4631 (KAM)(JRC)

Dear Judge Matsumoto:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, and I represent Defendants in the above-referenced matter. I write respectfully to request a one-week extension of Defendants' deadline to file a motion to dismiss the Plaintiffs' Second Amended Complaint ("SAC"). Pursuant to Your Honor's Individual Rule III(C)(2), I also request leave to exceed the standard page limit by ten pages for Defendants' memorandum of law. This request is made in light of the multiple Plaintiffs involved and the detailed factual background that must be addressed. This is Defendants first request for an extension, and it does not affect any other deadlines.

Given the breadth of the allegations raised in the SAC, including the number of individual Plaintiffs, additional time is needed to adequately address the issues and ensure a thorough and responsive filing. Accordingly, I respectfully request that the briefing schedule be modified as follows:

- Defendants' Motion to Dismiss: **June 4, 2025** (originally due May 28, 2025)
- Plaintiffs' Opposition: **July 7, 2025** (originally due June 27, 2025)
- Defendants' Reply: **July 21, 2025** (originally due July 11, 2025)

I have reached out to Plaintiffs' counsel via email to seek consent. While she indicated she would need to check her schedule, I have not yet received a response. In view of the approaching deadline, I submit this request without her position

Respectfully submitted,

Sonya Gidumal Chazin
Assistant Corporation Counsel

cc: All counsel of record (Via ECF)